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11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE DISTRICT OF ARIZONA

14 United States of America,  
15 Plaintiff,  
16 vs.  
17 Aaron Thomas Mitchell,  
18 Defendant.

19 CR22-01545-TUC-RM (EJM)

20 **UNOPPOSED MOTION TO  
21 DESIGNATE CASE AS COMPLEX  
22 (No Oral Argument Requested)**

23 It is expected that excludable delay under Title 18, United States Code,  
24 §3161(h)(7) will occur as a result of this motion or an order based thereon.

25 Pursuant to LRCrim 16.2 and 18 U.S.C. § 3161(h)(7)(B)(ii), defendant, through  
26 counsel, respectfully requests that this court designate the above-referenced matter as a  
27 complex case, based upon the following:

28 The government has disclosed over 73,000 pages of discovery in this matter, along  
1 with video and audio recordings. Moreover, discovery is still ongoing, and the defense  
2 expects to receive additional disclosure from the government soon. Already disclosed  
3 materials include DNA testing data and cell phone extraction files that not only require  
4 significant time to fully review, but which necessitate the use of qualified experts in their  
5 respective fields in order to properly prepare for trial and to represent Mr. Mitchell in a  
6 competent manner.

Based upon the foregoing, Mr. Mitchell moves the Court to designate the case as complex, vacate the discovery/disclosure/notice/request deadline and pretrial motions deadline set in the June 20 Scheduling Order (Doc. 55) as premature, and set a status conference to discuss scheduling and other case management matters.

Assistant United States Attorney Carin C. Duryee does not object to this request.

RESPECTFULLY SUBMITTED this 22nd day of June, 2023.

JON M. SANDS  
Federal Public Defender

/s/ Benjamin D. Singerman  
BENJAMIN D. SINGERMAN  
Assistant Federal Public Defender

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